

### **REMARKS**

This Amendment is responsive to the Office Action dated October 4, 2006. Applicants have amended claims 1, 9, 12, 17, 31 and 34, and canceled claims 3 and 25. Claims 6, 21-22, 27 and 36 were previously canceled. Claims 1, 2, 4-5, 7-20, 23, 24, 26, 28-35 and 37-38 are now pending.

The Office Action rejected former claims 1-5, 7, 9-15, 17-20, 23-26, 28-35, 37 and 38 under 35 U.S.C. 102(b) as being anticipated by Sita (US 6,301,299); and rejected claims 8 and 16 under 35 U.S.C. 103(a) as being unpatentable over Sita.

All pending independent claims have been amended. Applicants respectfully traverse the rejections to the extent such rejections may be considered applicable to the amended claims. The Sita reference fails to disclose or suggest the inventions defined by Applicants' claims, and provides no teaching that would have suggested the desirability of modification to arrive at the claimed invention.

All pending claims concern access to storage units of a memory in response to a single command that specifies a multidimensional block of video data. As amended, all pending claims now clarify that the command specifies a jump parameter indicating a number of storage units between each row of the block of video data. These features are clearly lacking from the Sita reference.

In particular, the Sita reference fails to disclose or suggest a single command that specifies a multidimensional block of video data, wherein the command specifies a jump parameter indicating a number of storage units between each row of the block of video data. This aspect of the pending independent claims was formerly recited in dependent claim 3 and other dependent claims.

Applicants respectfully traverse the former rejection of claim 3 to the extent such rejection may be considered applicable to the amended claims. The passages of Sita cited in the rejection of claim 3 have absolutely no nexus with the other passages of Sita cited in the rejections of former claim 1. Furthermore, the "offset values" described in Sita, which the Office Action correlated with Applicants' claimed jump parameter, do not indicate a number of storage units between each row of the block of video data. For these reasons, the current claims clearly distinguish the claimed invention from Sita.

The passages of Sita cited in the Office Action in the rejections of former independent claim 1 generally refer to FIGS. 2A-2C, FIGS. 6A-6C, and various passages describing these figures. As noted in the Office Action, for example, Sita discloses a half-macroblock read operation in which, because the half-macroblocks are split across a memory row, four read operations are used to obtain the desired data. See column 15, lines 23-26, cited in the Office Action. Notably, however, this passage does not state that the data defining the half-macroblock are in non-contiguous rows as required by Applicants' claims, but are simply "split across a memory row."

The passage of Sita on column 17, lines 17-20 further indicates that "all four memory access requests shown in FIGS. 6A, 6B and 6C are the result of a single op-code provided by the input memory controller." Nothing in any of this discussion of Sita, however, suggests that this single op-code includes any jump parameter, much less a jump parameter that indicates a number of storage units between each row of the block of video data, as required by the amended claims. Instead, Sita appears to rely on a storage arrangement within the memory to ensure that the half-macroblocks split across a memory row can be accessed properly in response to the op-code.

For the jump parameter feature of Applicants' claims, the Office Action cited column 23, lines 18-50 of Sita. This passage of Sita, however, has no absolutely no nexus to the passages in columns 15 or 17 of Sita relating to the single op-code provided by the input memory controller. Instead, the passage in column 23 of Sita concerns a "special case which may be used to fetch image pixels for a display. See column 22, lines 52-53, which immediately precede the cited passage of Sita on column 23.

The offset values described in columns 22 and 23 of Sita are nothing akin to a jump parameter of a memory access command that indicates a number of storage units between each row of the block of video data. To be sure, the offset values described in Sita represent an offset in the image to be used by a "pan and scan feature of the ATSC standard to convert an image having an aspect ratio of 16 by 9 for display of a 4 by 3 monitor." See column 22, line 64 to column 23, line 1.

Furthermore, the pixel offset, group offset, column offset and row offset values discussed in cited passages of Sita are nothing more than calculated values, which are used to facilitate this

aspect ratio transformation from an image for a 16 by 9 display to an image for a 4 by 3 display. None of these calculated offset values could be reasonably construed as a jump parameter within a memory access command that indicates a number of storage units between each row of the block of video data. First, the offset values in Sita are not part of the single op-code that the Office Action relied upon in the fundamental analysis of claim 1. Second, the offset values are calculated and not present within any instruction or command. In addition, the offset values simply map a desired portion of the 4 by 3 image from a 16 by 9 image for a cropped display on a monitor, and do not indicate a number of storage units between each row of the block of video data, as required by Applicants' claims.

For at least these reasons, the current amended claims clearly distinguish the Sita reference and place the current application into a condition for immediate allowance.

In summary, nothing in Sita suggests a single command that specifies a multidimensional block of video data, wherein the command specifies a jump parameter indicating a number of storage units between each row of the block of video data. The op-code in Sita causes four separate read operations that operate with respect to a specific data arrangement in the memory. Not only does the op-code of Sita not cause fetches from non-contiguous rows (insofar as the half-macroblocks are split across a memory row), but the op-code lacks any suggestion, whatsoever, of a jump parameter indicating a number of storage units between each row of the block of video data, as required by pending claim 1. Instead, the data arrangement in the memory of Sita appears to define the locations of the half-macroblocks without any need for a jump parameter.

Furthermore, the disparate passage of Sita in columns 22-23, which concerns a "special case which may be used to fetch image pixels for a display," is totally unrelated to the single op-code discussed in column 15 of Sita. These two cited passages of Sita lack any nexus to one another, and the passage in columns 22-23 does not teach a jump parameter that could be included in the op-code discussed in column 15 of Sita.

Regardless, the passage of Sita in columns 22-23 also lacks any teaching or suggestion of a direct memory access to storage units of a memory in response to a single command that specifies a multidimensional block of video data, wherein the command specifies a jump parameter indicating a number of storage units between each row of the block of video data. As

noted above, the offset values in columns 22-23 of Sita are not part of the single op-code discussed in column 15 of Sita. Furthermore, the offset values in Sita are calculated and not present within any instruction or command. In addition, the offset values in Sita simply map a desired portion of the 4 by 3 image from a 16 by 9 image for a cropped display on a monitor, and do not indicate a number of storage units between each row of the block of video data, as required by Applicants' claims.

In view of the claim amendments and foregoing remarks, all claims in this application are in condition for allowance. Applicants respectfully request reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 17-0026. The Examiner is invited to telephone the below-signed attorney to discuss this application.

Date:

By:

1/4/07  
\_\_\_\_\_  
QUALCOMM, Inc.  
Patents Department  
5775 Morehouse Drive  
San Diego, CA 92121-1714  
Telephone: (858) 651-1306  
Facsimile: (858) 658-2502

/George C. Pappas/  
\_\_\_\_\_  
Name: George Pappas  
Reg. No.: 35,065